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7 *Attorneys for Defendants*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 CHRISTINA M. MARTINEZ,  
12  
13 Plaintiff,

14 v.

15 ACTIVATE LAS VEGAS NEWMAN PC;  
ACTIVATE HEALTHCARE, PC; ACTIVATE  
16 HEALTHCARE, LLC; CULINARY HEALTH  
FUND ADMINISTRATIVE SERVICES, LLC,  
17  
18 Defendants.

Case No.: 2:18-cv-01196-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT'S TIME TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT [SECOND REQUEST]**

19 Plaintiff CHRISTINA M. MARTINEZ ("Plaintiff") , by and through her attorneys of record,  
20 M. Lani Esteban-Trinidad, Esq. of The Thater Law Group and Defendants ACTIVATE LAS VEGAS  
21 NEWMAN PC; ACTIVATE HEALTHCARE, PC; ACTIVATE HEALTHCARE, LLC; CULINARY  
22 HEALTH FUND ADMINISTRATIVE SERVICES, LLC ("Defendants"), by and through its attorneys  
23 of record, Deanna L. Forbush, Esq. and Jeremy J. Thompson, Esq. of Clark Hill PLLC, hereby stipulate  
24 to the following: 1) Plaintiff Christina M. Martinez filed a Complaint against Defendants on June 29,  
25 2018 and served said Complaint upon Defendants on July 3, 2018; 2) Defendants' response to said  
26 Complaint is currently due on July 24, 2018; 3) the Parties agree that Defendant shall have until August  
27 23, 2018 to file a response to Plaintiff's Complaint.  
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1 The extension for Defendants' time to response to Plaintiff's Complaint was necessitated by  
2 and is being requested due to the fact that it took until yesterday for the Defendants to agree to joint  
3 representation and sign the requisite waivers, agreements, and consents. Accordingly, defense counsel  
4 was only officially jointly retained yesterday, the same day that Defendants' response was due.  
5 Accordingly, Defendants will require the additional time requested to consult with counsel and prepare  
6 a joint response to Plaintiffs' Complaint. Plaintiff's counsel has been consulted and has graciously  
7 agreed to the extension.

8 IT IS SO STIPULATED on this 25<sup>th</sup> day of July, 2018.

9 **THE THATER LAW GROUP, P.C.**

**CLARK HILL PLLC**

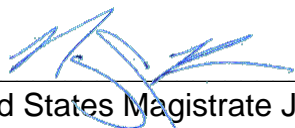
10  
11 By: /s/ M. Lani Esteban-Trinidad, Esq.  
12 M. LANI ESTEBAN-TRINIDAD, ESQ.  
13 Nevada Bar No. 6967  
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By: /s/ Deanna L. Forbush, Esq.  
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18  
19 **ORDER**

20 **IT IS SO ORDERED.**

21 Dated: July 26, 2018

22  
23   
24 United States Magistrate Judge  
25  
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27  
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